

EXHIBIT 3

November 12, 1997

Jason Lopez - Golden Gate Public Radio
250 Dorland, NE 3
San Francisco, CA 94114

Ernest Sanchez
2000 L Street, NW, Suite 200
Washington, DC 20036

—Dear Mr. Sanchez:

We at GGPR apologize for the delay in providing a copy of our petition to you. Please be advised that our copy of the petition is in the possession of Dave Evans - KALW Chief Engineer and GGPR founder. Mr. Evans was in a serious accident shortly after we filed and is currently in critical condition in the hospital. We are doing all we can to locate and retrieve our copy for our own purposes as well as to provide copies to relevant parties such as yourself. Enclosed is the text of the petition without exhibits. We expect to acquire the petition soon and will send you a copy as soon as possible.

Sincerely,

Jason A. Lopez

DECLARATION OF WILLIAM HELGESON

I, William Helgeson, under penalty of perjury, do declare as follows:

1. My name is William Helgeson. My address is 184 BONVIEW ST.
SAN FRANCISCO, CA. I make this declaration based upon my own personal knowledge.

2. I am presently employed by the San Francisco Unified School District ("SFUSD") as Program Manager for KALW(FM); this position is also termed "Operations Manager." My responsibilities in this position include managing certain of the business affairs of KALW, including contracts with employees and consultants.

3. I have responsibility for maintaining a four-drawer file cabinet in my work area, located near my desk, at KALW's office. The third drawer of that file cabinet contains KALW's public file. The other three drawers contain non-public business-related documents that are the property of KALW and SFUSD. Only I and my supervisors have authorized access to these other three drawers.

4. I am aware of, and have assisted with, an ongoing affirmative effort since the arrival of Jeffrey Ramirez as General Manager of KALW, to update and maintain the station's public inspection file in accordance with the rules of the Federal Communication Commission.

5. I have been shown copies of three documents that were attached as Exhibits to Golden Gate Public Radio's Petition to Deny Application for License Renewal of Radio Station KALW, San Francisco, CA (File No. BRED-970801 VA): Exhibits N, W, and AA. I am familiar with all four documents and, in the ordinary course of business, have custody of the originals of Exhibits W and AA.

6. Exhibit N is a copy of a Separation Report prepared by the Civil Service Commission of the City and County of San Francisco with respect to my promotion from the position of Senior Clerk Typist in September 1992. I ordinarily retained a copy of that Notice in my own personal career-related file at the KALW office. To my knowledge, the original and any copies of this document would be retained, in the ordinary course of business, by the Human Resources Department in my personnel file. I did not authorize the Human Resources Department to provide access to that file to any other person. Neither did I authorize any of the following individuals: Jason Lopez, Deirdre Kennedy, Michael Johnson, Dave Evans, Mel Baker, Susan Hecht, Joann Mar, Joe Hughes, or Hedy Jacobowitz, or any other person, to have access to, obtain, or copy this document or any other material in my personnel file. If Golden Gate Public Radio,

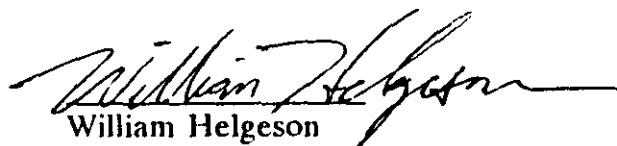
or any of the named individuals, obtained a copy of this document, this would have been done without my authorization and in violation of my right to privacy with respect to my personnel file.

7. Exhibits W and AA, respectively, are copies of the following documents: a draft of an Agreement between SFUSD and Lynne Nerenbaum, bearing the date May 15, 1997, but unsigned by any representative of SFUSD and an SFUSD official Resolution Request Form (also known as a "K" Form) which is used to request Board approval of a proposed resolution for the District to enter into a contract with an external consultant. I am familiar with each of these documents. The original of these documents is the property of SFUSD and, as such, is maintained in the ordinary course of business in my above-described file cabinet in one of the non-public drawers. None of the following individuals: Jason Lopez, Deirdre Kennedy, Michael Johnson, Dave Evans, Mel Baker, Susan Hecht, Joann Mar, Joe Hughes, or Hedy Jacobowitz, has authorized access to these non-public drawers and I did not provide the original or a copy of any of these documents to any of these named individuals. If Golden Gate Public Radio, or any of the named individuals, obtained a copy of these documents, this would represent a breach of SFUSD security.

8. As Program/Operations Manager for KALW, I am aware that no employee of SFUSD/KALW is permitted to know or have access to the computer password of any other employee. If Golden Gate Public Radio, or any of the individuals named in paragraph 7 of this Declaration, obtained Mr. Ramirez' password and used it to access his e-mail messages, this would represent a breach of SFUSD security and of Mr. Ramirez' privacy.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 1/16, 1998.


William Helgeson

DECLARATION OF ERNEST T. SANCHEZ

I, Ernest T. Sanchez, under penalty of perjury, do declare as follows:

1. My name is Ernest T. Sanchez. My office address is 2000 L Street, N.W., Suite 200, Washington, D.C. 20036. I am an attorney and a member of the District of Columbia Bar. I make this declaration based upon my own personal knowledge.

2. I am communications counsel for the San Francisco Unified School District ("SFUSD"), the licensee of KALW(FM). On October 1, 1997, I received by fax a letter from an attorney who stated therein that he was counsel to Golden Gate Public Radio (hereafter, "GGPR"). This letter, a copy of which is attached hereto as Exhibit 8, refers to a GGPR proposal that the operation and management of KALW should be transferred to GGPR. The letter threatened that, unless "good faith substantive negotiations aimed at a transfer of management of the station are underway by October 10th", GGPR would begin preparations to file a petition to deny KALW's application for license renewal.

3. SFUSD declined to meet GGPR's demands.

4. Although SFUSD and I expected GGPR to carry through with its threat, we had not been served with any petition by early November. I contacted GGPR's counsel by telephone on November 11, to inquire whether it had been filed. During that conversation, I learned for the first time that GGPR had, in fact, filed a petition to deny. On or about November 11 or 12, 1997, I received a call from Jason Lopez, who also acknowledged that the petition had been filed but that, due to an accident involving Dave Evans, Lopez and Kennedy did not have access to their copy of the petition or exhibits. On or about November 13, 1997, I received a note dated November 12, from Jason Lopez along with an unsigned draft of the petition, with no exhibits or affidavits. A copy of that note is attached as Exhibit 9. SFUSD never agreed to waive service.

5. On December 9, 1997 I received from SFUSD a copy of a letter dated December 5, 1997 from Y. Paulette Laden, Chief, EEO Branch of the Commission's Mass Media Bureau, to Mr. Lopez and Ms. Kennedy, a copy of which is attached hereto as Exhibit 10. The letter indicates that no certificate of service had been filed with GGPR's Petition when it was first filed and that an inquiry was being made as to whether or not service had been made. Ms. Laden offered GGPR 20 days within which to submit proof that SFUSD had been served in accordance with Rule 1.47. As of that date, December 9, 1997, neither I nor my client had yet been served with the Petition that, we learned, had been filed as of November 3.

6. It had been my understanding from prior communications with my client and GGPR representatives that the three directors of GGPR are Deirdre Kennedy, Jason Lopez, and Mel Baker. I had never before been told or seen any documentation that stated that Mr. Evans had any official capacity with respect to GGPR and was, therefore, surprised by Mr. Lopez' contention that Mr. Evans was a "GGPR founder."

7. I was finally served with a complete copy of GGPR's Petition to Deny on December 11, 1997. It had been sent to me, along with a copy of an FCC Service form, the previous day by Federal Express. Exhibit 11 is a copy of the the FCC service form as signed by Ms. Kennedy, which is dated December 10, 1997.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 1/19/98, 1998.


Ernest T. Sanchez

EXHIBIT 8

BERCHENKO & KORN

ATTORNEYS AT LAW

JEFFEREY A. BERCHENKO
ALAN KORN115 SANSOME STREET, FOURTH FLOOR
SAN FRANCISCO, CALIFORNIA 94104TELEPHONE (415) 362-5700
FACSIMILE (415) 362-4119CERTIFIED TAXATION SPECIALIST
THE STATE BAR OF CALIFORNIA
BOARD OF LEGAL SPECIALIZATION

October 1, 1997

Mr. Ernest T. Sanchez
Sanchez Law Offices
2000 "L" Street, NW, Suite 200
Washington, DC 20036VIA U.S. MAIL & FACSIMILE

Dear Mr. Sanchez:

The undersigned is counsel to Golden Gate Public Radio, a California Public Benefit corporation. This letter is in follow-up to our telephone conversation of earlier today.

My clients are frustrated at the San Francisco Unified School District Board of Education's non-response to their Governance Proposal for KALW dated June 1997. As you know, this proposal has previously been supplied to you. Accordingly, it is not enclosed today. If you do not currently have a copy, please contact the undersigned immediately.

The non-response to my clients' proposal has caused them to prepare a list of reasons that they believe form the basis for a petition to deny KALW's license renewal. A copy of this list is enclosed. As we discussed, the list would become the core of a petition to deny the station's license renewal. Although the undersigned is not a specialist in FCC matters, my clients have been told by such specialists that it is their opinion that these complaints may well serve as the successful basis for a petition to deny the license renewal.

Denying the station's license renewal may not best serve my clients' needs. As you know, under new FCC rules, my clients would stand shoulder to shoulder with any other new applicant. Accordingly, I believe it is in both the school board's and my client's interest for a negotiated settlement to occur.

Mr. Ernest T. Sanchez

October 1, 1997

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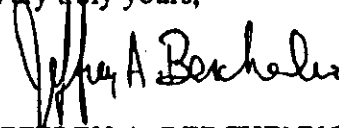
The core of my clients' previously provided proposal is that my client, a bona fide non-profit, wishes to operate station KALW. Currently, my clients are a valid California non-profit corporation and have achieved IRS §501(c3) status. My client's proposal is to increase the size of its board (currently three persons) to a large enough body to include a majority of Unified School District appointed representatives. The non-profit would then operate the station.

This proposal is completely in line with the Board's KALW Task Force 1996 report, which criticized the lack of oversight for the station and suggested that such a non-profit be formed. My client's proposal, which includes reinvigorated fundraising, also would relieve the Board of Directors of a substantial financial burden. Accordingly, my clients hope that their proposal would have been well received.

Because of the time necessary to write a petition to deny, the time for negotiation between our clients is short. My clients have set a deadline of October 10th to begin writing the petition to deny. If good faith substantive negotiations aimed at a transfer of management of the station are not underway by that date, the negotiations will cease and work on the petition will begin. Accordingly, this is to urge you to urge your client to immediately review the proposal and begin negotiations with my clients. Unfortunately, this means that at least a preliminary indication of willingness to enter into discussions must occur this week.

Thank you in advance for your prompt attention to this request.

Very truly yours,



JEFFREY A. BERCHENKO
Attorney at Law

cc: Golden Gate Public Radio

Enclosures

JAB/dp